

IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

IN RE: : CASE NO. 19-10473
GISELE S. REED :
DEBTOR(S) : JUDGE BETH A. BUCHANAN
: TRUSTEE'S OBJECTION
: TO CONFIRMATION

Comes now the Chapter 13 Trustee, Margaret A. Burks and files this objection to the Plan filed by debtor(s). The Trustee objects for the reasons stated herein. Requested documents have not been provided.

- a) Amend Liquidation Analysis - debtor owns ½ of brother's intended residence, free and clear property (less outstanding taxes)- equity was left off - will her interest in this property make this make case ``solvent''?
- b) Amend Schedule H - add son (Wendell Reed) - loan is a deficiency held by Ally Financial already on Schedule F in line 4.1.
- c) Amend Plan - is brother current on taxes for Kirkup property? Provide for brother paying Treasurer. Brother intends to move in within six (6) months.
- d) Is brother maintaining insurance on Kirkup? If not, debtor may need to maintain liability insurance protecting herself.
- e) Review Schedule I - base salary is \$8,129.33 (\$3,752.40 bi-weekly). Is Schedule I accurate?
- f) Son at home is employed - either take off of Means Test, or show his income on 122C **and** Schedule I.
- g) Resolve objection filed by American Honda Finance Corp.

The Trustee requests that the Court uphold her objection.

Respectfully submitted,

/s/ Margaret A. Burks, Esq.
Margaret A. Burks, Esq.
Chapter 13 Trustee
Attorney Reg. No. OH 0030377

Francis J. DiCesare, Esq.
Staff Attorney
Attorney Reg. No. OH 0038798

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Chapter 13 Trustee's Objection to Plan Confirmation was served **electronically** on the date of filing through the court's ECF System on all ECF participants registered in this case at the email address registered with the court and by **ordinary U.S. Mail** on April 24, 2019 addressed to:

Gisele S. Reed
debtor(s)
3969 Zinsle Ave.
Cincinnati, OH 45213

/s/Margaret A. Burks, Esq.
Margaret A. Burks, Esq.

Francis J. DiCesare, Esq.

Tammy E. Stickley, Esq.

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

IN RE: : CASE NO. 19-10473
: CHAPTER 13
GISELE S. REED : JUDGE BETH A. BUCHANAN
DEBTOR(S) :
: **NOTICE OF OBJECTION**
: **TO CONFIRMATION**

The Chapter 13 Trustee, Margaret A. Burks, has filed an Objection to Confirmation of the Plan filed in the above-referenced case.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the relief sought in objection to confirmation, or if you want the court to consider your views on the objection, May 16, 2019, at the United States Bankruptcy Court, Atrium II, Suite 800, 221 East 4th Street, Cincinnati, Ohio 45202.

You may also file a Response explaining your position.

If you mail your response to the court for filing, you must mail it early enough so the court will receive it before the confirmation hearing.

If you file a Response, you must also mail a copy to:

Margaret A. Burks
Chapter 13 Trustee
600 Vine Street
Suite 2200
Cincinnati, Ohio 45202

U.S. Trustee
36 East 7th Street
Suite 2030
Cincinnati, Ohio 45202

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the objection and may enter an order granting that relief.

Date: April 24, 2019

/s/Margaret A. Burks, Esq.
Margaret A. Burks, Esq.